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Jeffrey M. Nelson
Chief Legal Officer

March 14, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: CWS Annual Rate Adjustment Mechanism
Proposed Amended Notice
Docket No. 2018-358-WS

Dear Ms. Boyd,

ORS has reviewed Blue Granite Water Company's ("BGWC" or "Company") proposed Amended Notice in the above referenced case which was filed with the Commission on March 13, 2019.

ORS recommends the Commission reject the proposed amendment to the Notice of Filing ("NOF") requested by BGWC for the following reasons:

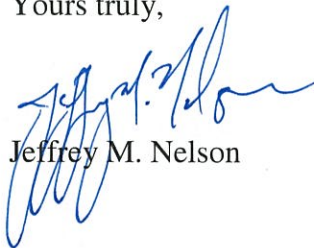
- 1) The original NOF lacks transparency; however, the Schedule of Rates indicates the Application contains a significant rate increase.
- 2) The proposed Amended Notice eliminates the Schedule of Rates which is the only indicator that the Application by BGWC results in a rate increase to customers.
- 3) For a BGWC customer, the proposed amendment is not sufficient for a customer to conclude that the Company has applied for a significant rate increase.

- 4) The period for intervention is abbreviated such that an interested party has less than thirty (30) days from receipt of the NOF to file a petition to intervene and participate in the process.

For the above reasons, ORS recommends the Commission require the Amended NOF contain the Schedule of Rates as originally contained in the NOF posted by the PSC on March 6, 2019. ORS further recommends that the NOF could be abbreviated to include only 1 description of the Rate Adjustment Mechanism for Water Distribution Customers; as opposed to the 2 included in the NOF. In addition, the time period for intervention should be extended such that interested parties are allowed 30 days from the date of the published notice to petition to intervene.

Please feel free to contact me should you have any questions.

Yours truly,



Jeffrey M. Nelson

cc: Joseph Melchers, Esquire (via E-mail)
All Parties of Record (via E-mail)